

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT
 for the
 Northern District of New York

UNITED STATES OF AMERICA

v.

JEFFREY BLAKE

Defendant

Case No. 3:19-MJ-544 (TWD)

CRIMINAL COMPLAINT

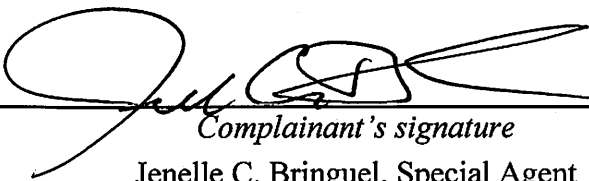
I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the dates of June 12, 2019 through August 23, 2019 in the county of Broome in the Northern District of New York the defendant violated:

Code Section
 18 U.S.C. § 2422(b)

Offense Description
 Coercion and Enticement of a Minor

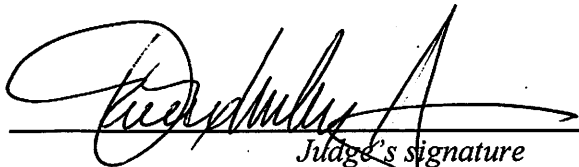
This criminal complaint is based on these facts:
 See Attached Affidavit in Support of Criminal Complaint.

☒ Continued on the attached sheet.


 Complainant's signature
 Jenelle C. Bringuel, Special Agent
 Printed name and title

Sworn to before me and signed in my presence.

Date: Aug 24, 2019


 Judge's signature
 Hon. Thérèse Wiley Dancks, U.S. Magistrate Judge
 Printed name and title

City and State: Syracuse, New York

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jenelle Bringuel, having been first duly sworn, do hereby depose and state as follows:

1. I have been employed as a Special Agent of the FBI since June 2012 and am currently assigned to the Albany Division, Binghamton Resident Agency. I am specifically assigned to the Mid-State Child Exploitation Task Force (MSCETF), which targets individuals involved in the on-line sexual exploitation of children. As part of my duties, I investigate crimes involving the sexual exploitation of minors, including sex trafficking of minors and various criminal offenses related to the production, distribution, receipt, and possession of child pornography. I received training on the proper investigative techniques for these violations, including the use of surveillance techniques, undercover activities, and the application and execution of arrest and search warrants. I have conducted and assisted in several child exploitation investigations and have executed search warrants that have led to seizures of child pornography and undercover operations to identify and locate individuals who seek to engage in sexual activity with minors.

2. I am an investigative or law enforcement officer of the United States within the meaning of Title 18 United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1). As an FBI Special Agent, I am authorized to seek and execute federal arrest and search warrants for Title 18 criminal offenses, including offenses related to the sexual exploitation of minors.

3. I make this affidavit in support of a criminal complaint charging JEFFREY BLAKE with using a facility and means of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce an individual who has not attained the age of 18 years to engage in sexual activity for which any person can be charged with a criminal offense, in violation of Title

18, United States Code, Section 2422(b).

4. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officers, and on my experience and training as a Special Agent of the FBI. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that JEFFREY BLAKE has violated Title 18, United States Code, Section 2422(b).

Details of the Investigation

5. In June 2019, a law enforcement officer acting in an undercover capacity (hereinafter “UC”) posted a description in the “about me” section of a social-networking and dating application located on the internet. The description used language commonly associated with individuals seeking children for sexual purposes.

6. On or about June 12, 2019, the UC received a message on the social-networking application that read, “Tell me more...” The message was from a person with the username “J.” The geo-location of the user was Ithaca, NY. The UC did not respond to this initial message. On or about June 13, 2019, the UC received another message from the same user that read, “Interested.” On that same date, the UC replied to the message by typing: “In?” The user “J” replied to the UC, “Finding out more about what you’re looking for. Into younggg.”¹

7. The UC and user “J” (later identified as JEFFREY BLAKE²) exchanged further messages using a texting application. The UC posed as a mother with two young daughters, ages thirteen

¹ Based on your affiants training, experience and knowledge in prosecuting these types of cases, the word “young” written with multiple “g’s” at the end has commonly been used as indicative of someone who is sexually attracted to minors.

² Subpoenas requesting subscriber information for two phone numbers used by “J” were issued to a service provider which identified that a common phone number, XXX-XXX-2988, was used to register the two phone numbers used by “J” to communicate with the UC. Open-source analysis identified XXX-XXX-2988 as a phone number associated with Jeffrey Blake. A subpoena to the service provider who owns XXX-XXX-2988 also identified the subscriber as Jeffrey Blake.

(13) and nine (9).

8. While texting with the UC on June 13, 2019, BLAKE expressed an interest in meeting to engage in sexual activities with the UC and her daughters. BLAKE indicated that he was in his mid-40s and had previously “taught” young girls as young as six (6) or seven (7) years old, and as old as thirteen (13) or fourteen (14) years old. When asked what he would do with the UC’s daughters, BLAKE stated that he “would slowly introduce them to pleasure, proceeding as the feel comfortable to teaching them to give pleasure.” When the UC asked BLAKE, “will you just do touching and oral? Or vaginal/anal too?” BLAKE responded: “all of the above, eventually, if they are comfortable going farther. Definitely touching and oral both receiving and giving.” Additionally, during this initial conversation with the UC, BLAKE emphasized that this experience with the girls will take “gentle persuading and encouragement.” BLAKE suggested to the UC that he reach out to the girls directly, and the UC provided him with two phone numbers purported to be cell phone numbers used by each of the girls, respectively.

9. On June 14, 2019, BLAKE suggested to the UC, via text message, that he would like to bring each of the girls a dress, make-up, and jewelry so they can participate in a “fashion shoot” with BLAKE in order to help them “get comfortable with [BLAKE] touching them.” On this same date, BLAKE told the UC that he also planned to purchase sex toys for the girls, and sent a screenshot of two vibrators, one pink and one blue, which he indicated he would buy for them.

10. On June 17, 2019, using the phone number provided to him for the child, BLAKE engaged in a conversation with the UC’s 9 year old daughter, who was being impersonated by the UC.

Below is portion of that conversation:

BLAKE:	I wanna spend the whole day with you and (13 year old) and your mom
9 YO GIRL:	o ok
9 YO GIRL:	what r we gona do
BLAKE:	I hear you're a little nervous
BLAKE:	How about we play dress up? And we will talk about lots of stuff

9 YO GIRL: um ya a lil

BLAKE: I know you have lots of questions for me 😊

BLAKE: Can you tell me why you're nervous?

9 YO GIRL: lol um like I think u r gona teach me about stuff but like I don't rly kno like what 2 do n stuff

BLAKE: That's why your mom asked me to teach you, to show you what to do, and to make you feel good

9 YO GIRL: o ok

BLAKE: Do you make yourself feel good sometimes? It's ok to tell me anything, say what's on your mind and ask questions! You'll never ever get in trouble for that 😊

BLAKE: Your mom will tell you the same thing

9 YO GIRL: loll like my private parts

BLAKE: Yep

9 YO GIRL: lol like she told me its ok n i could but i duno what to do really

BLAKE: Explore. Touch them, find out what feels good. you can Ask your mom too, she's a girl and she knows what feels good

9 YO GIRL: lol ya but thats wierd lol

BLAKE: Talking to mom? Or touching yourself?

9 YO GIRL: lol like talkin 2 her bout that

BLAKE: You're talking to me about it 😊

9 YO GIRL: when u come we r gona play dres up?

BLAKE: What would you like to know?

BLAKE: Yep, ill bring your new dress and some other stuff

9 YO GIRL: um like wher do i like touch

9 YO GIRL: other stuff?? 😊

9 YO GIRL: what kinds of stuff

BLAKE: If you touch there, where your lips are, in between is a little button. You rub that gently with your finger. Try it 😊

9 YO GIRL: lol o

9 YO GIRL: like rite now

BLAKE: Maybe some pretty panties? Maybe some jewelry. I'm gonna make you my little princess for a day 😊

BLAKE: Yes, right now

9 YO GIRL: 😊😊☐

BLAKE: Just rub up n down a little

9 YO GIRL: k

BLAKE: Slowly, move your finger around till you feel tingles down there

9 YO GIRL: im tryin

BLAKE: Good girl 😊

BLAKE: If you go a little lower there's a little place you can slide you finger into too

9 YO GIRL: like where the flaps r

BLAKE: Yes

BLAKE: Do you feel tingles? Does it feel good princess?

9 YO GIRL: a lil lol
 BLAKE: That's great! Good job
 9 YO GIRL: like is that sex tho
 BLAKE: If your finger doesn't slide easy you can get your finger wet with your tongue
 9 YO GIRL: ew like after its been by my privates
 9 YO GIRL: shouls i wash my hand 1st
 BLAKE: Use a different finger
 BLAKE: Well it's a good idea to wash your hands, but you just had a shower right? You're pretty clean
 9 YO GIRL: ya but like u said to lick my fingr but like it was just near my privates
 BLAKE: It's not actually sex princess, but it's the next best thing
 BLAKE: Oh yes sorry, you should wash them, unless you use a different finger
 9 YO GIRL: o lol ok
 BLAKE: The best part is you can play anytime you want to make tingles and feel good!
 9 YO GIRL: like by myself rite lol
 BLAKE: Not always ☺ but yes. We will play together too! and maybe with (13 year old) if you want to. But don't worry about that right now.
 BLAKE: Tell me what you're doing now
 9 YO GIRL: talkin to u lol
 BLAKE: What are you doing with your fingers?
 9 YO GIRL: o like its in between the flaps but like its weird
 BLAKE: Weird?
 9 YO GIRL: do i push it in
 BLAKE: Yes, just a little at first
 9 YO GIRL: wont it hurt
 BLAKE: Not if you're gentle, but if you want to wait just rub your button ☺
 9 YO GIRL: ok
 BLAKE: We can play like this on the phone whenever you like
 9 YO GIRL: r u goin to do this to me
 BLAKE: If you want me to absolutely!
 BLAKE: And so much more fun stuff ☺
 9 YO GIRL: u r a grown up tho rite? wont it hurt me if we hav sex
 BLAKE: I am, and I will make sure it doesn't hurt princess. The first time might a little bit though but I'll be gentle
 9 YO GIRL: o ok
 9 YO GIRL: im scared of it hurting
 BLAKE: I know ☺ but don't be ok? I promise it will be fun

11. On June 18, 2019, BLAKE had another conversation with the UC's 9 year old daughter, who was being impersonated by the UC, wherein BLAKE was made again aware of her age:

BLAKE: What grade are you in?
 9 YO GIRL: 3rd now but go to 4th next yr

BLAKE: Awesome 🍌

12. On June 19, 2019, using the phone number provided to him for the child, BLAKE engaged in a conversation over text messages with the UC's 13 year old daughter, who was being impersonated by the UC. This was the first time BLAKE spoke directly with the 13 year old girl.

The following is a portion of that conversation after introductions:

BLAKE: What do you think about having fun and learning lots of stuff?
 13 YO GIRL: i do like to learn new things...lol n hav fun obviolsly
 BLAKE: I bet you've started exploring your body... 😊
 BLAKE: Making yourself feel good?
 BLAKE: Well your mom asked me to show you so much more 😊
 13 YO GIRL: lol a lil
 13 YO GIRL: like what?
 13 YO GIRL: i dont really kno what im doin
 BLAKE: How good it feels when someone else does it too
 BLAKE: I'll show how many ways I can make you tingle and I'll teach you how to do the same with me 😊
 13 YO GIRL: ur like a grownup tho right? wont u like hurt me whn u do stuff?
 BLAKE: I am, but no I won't hurt you!
 BLAKE: I'll make you feel good... When we have sex it might be a little uncomfortable the first time, I won't be dishonest with you sweetie... But I will not hurt you.
 13 YO GIRL: but like im small and i havnt done it b4....i heard that like it hurts
 BLAKE: I'll show you how my tongue and fingers will make you feel
 BLAKE: If it hurts then the boy is doing it wrong. Like I said the first time would be uncomfortable at first
 13 YO GIRL: wont ur fingers like hurt me even?
 BLAKE: I'm very gentle babygirl... But don't worry, we aren't going to do everything all at once. We will go slow. I'll be seeing you lots
 13 YO GIRL: oh okay
 13 YO GIRL: what r we goin to do when i first meet u
 BLAKE: Talk, we can talk about what we want to do that day, kisses and touches. I want to get you all dressed up in your new dress n stuff I've picked out for you, and have a photo shoot 😊 I want you to feel comfortable with me.
 BLAKE: Well first I want a hug! Deal?
 13 YO GIRL: lol deal
 13 YO GIRL: what kind of touching? like u to me or me to u
 BLAKE: mostly me to you at first but both
 BLAKE: You asked about my fingers but you didn't say anything about my tongue
 BLAKE: And your tongue
 13 YO GIRL: oh lol i didnt think about that
 BLAKE: You rub your little button when you play?

13 YO GIRL: button?
 BLAKE: Tell me what you've done while playing. What makes you tingle?
 13 YO GIRL: just like rub myself
 BLAKE: Where do you rub?
 BLAKE: I want you to try this for me... Lick your middle finger so it's all wet at the tip, then At the top of your lady bits, just between the lips. A littlebutton called your clit. Find it with your finger and rub up and down... Your wet finger should make it slippery and feel even better...
 13 YO GIRL: ok...
 BLAKE: Tell me how it feels 😊
 13 YO GIRL: it feels good

13. On August 15, 2019, BLAKE again spoke with the UC's 9 year old daughter, who was being impersonated by the UC, over text message. The following is a portion of that conversation:

BLAKE: Hey princess
 9 YO GIRL: hi wats up
 BLAKE: Do you still want to see me? and learn about touches and kisses and sex princess? You know it's up to you right?
 9 YO GIRL: ya!
 9 YO GIRL: its stil okay wit lik my mom n stuf rite?
 BLAKE: Why, do you think doesn't want you to learn now? Ask her when she gets home princess 😊
 BLAKE: I bet she says it is absolutely ok
 BLAKE: Are YOU ok with it?
 9 YO GIRL: oo ok just makin sur!
 9 YO GIRL: ya if its okay wit my mom n lik it dosnt hurt or nethin
 9 YO GIRL: u said lik it wodnt rite?
 BLAKE: Wouldn't?
 9 YO GIRL: ya lik sex n stuff doesnt hurt rite?
 9 YO GIRL: my friend said it did
 BLAKE: Has your friend had sex and played?
 9 YO GIRL: i duno she said she did stuf wit a boy but she lies sumtimes i think
 BLAKE: I won't hurt you princess, ever I'm sorry if some horrible boy hurt your friend 😊
 9 YO GIRL: its okay, she sed it hurt when he put his privite part inside her
 BLAKE: I told you that might be a little uncomfortable at first but I'll make sure It doesn't hurt
 9 YO GIRL: o okay!
 9 YO GIRL: is it uncomfertable for u to?
 BLAKE: Yes sometimes
 BLAKE: But we'll have fun and be gentle 😊
 9 YO GIRL: okayyy 😊
 9 YO GIRL: she told me girls can get pregnant wen boys put there privite parts inside girls

BLAKE: Sweetheart I think you should not listen to this girl, ask your momor me ok? Yes older women can get pregnant but You won't I absolutely promise 😊

9 YO GIRL: oo okay lol ya okay i will ask u or mom nemore

9 YO GIRL: can lik (13 year old) get pregnant wen u hav sex wit her

9 YO GIRL: cuz shes lik older

BLAKE: That's good

BLAKE: No sh can't get pregnant, we will make sure 😊

9 YO GIRL: oo okay good 😊

BLAKE: (13 year old) and I already talked about it

9 YO GIRL: oo okayy!

14. On August 15, 2019, BLAKE had another conversation with the UC's 13 year old daughter, who was being impersonated by the UC, wherein BLAKE is made again aware of her age:

BLAKE: It's a special day all about you 😊

BLAKE: And it's a Saturday this year! So No school on your 14 1/2 birthday!! I get to make you a princess for the whole day 😊😊

BLAKE: Whatcha doin babygirl?

13 YO GIRL: not much, playin outside

13 YO GIRL: lol ill be 13 1/2 jack!

13 YO GIRL: (9 year old) and me r next door

BLAKE: Oh right sorry

15. BLAKE engaged in additional conversations where he indicated to the UC, posing as both the nine (9) year old daughter and the thirteen (13) year old daughter, that he will be bringing them each gifts such as dresses, headbands, jewelry, and panties.

16. On August 15, 2019, the UC engaged in a telephone conversation with BLAKE who identified himself as the person who had been chatting with the UC and her daughters. BLAKE discussed meeting with the UC to engage in sex with the UC's daughters. BLAKE also discussed purchasing gifts such as accessories, lip gloss, dresses, and vibrators for the UC's daughters. BLAKE indicated to the UC he had previously purchased gifts for the girls, such as those just listed, for their original meeting in June 2019, but that he had to return them to pay his rent after he lost his job. BLAKE discussed his conversations with the nine (9) year old daughter, and advised he had told her that when he and she would engage in sex, it may be uncomfortable for

her but promised he would never hurt her. Blake and the UC agreed upon a meet location in Binghamton, NY, and arranged to meet there at 1:30 p.m. on Friday, August 23, 2019.

17. On August 23, 2019, JEFFREY BLAKE, arrived at the pre-arranged location in Binghamton, NY. BLAKE admitted to traveling Binghamton and brought with him necklaces, bracelets, and earrings which he said that he purchased and planned to give to the children when he arrived. After being placed under arrest, BLAKE was read his *Miranda* rights, which BLAKE waived. BLAKE also possessed a cellular phone with camera capability.

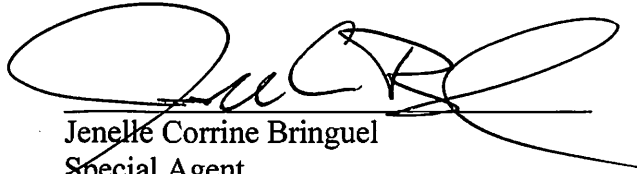
18. BLAKE admitted to law enforcement that he was the same person that UC had been communicating with since June 12, 2019. BLAKE further admitted that he had engaged in the conversations with UC's daughters, ages thirteen (13) and nine (9).

19. The acts that BLAKE planned to engage in with the children, as described in his chats with the UC and the children, are crimes punishable under Article 130 of the New York State Penal Law, including but not limited to: Attempted Criminal Sexual Act in the First Degree, in violation of New York State Penal Law Section 110/130.50 (a class C felony), in that BLAKE stated an intention to engage in oral sexual conduct and anal sexual conduct with the 9 year old girl; Attempted Rape in the Second Degree, in violation of New York State Penal Law Section 110/130.30 (a class E felony), in that BLAKE stated an intention to engage in sexual intercourse with the 13 year old girl; and Attempted Rape in the First Degree, in violation of New York State Penal Law Section 110/130.35 (a class C felony), in that BLAKE stated an intention to engage in sexual intercourse with the 9 year old girl.

Conclusion

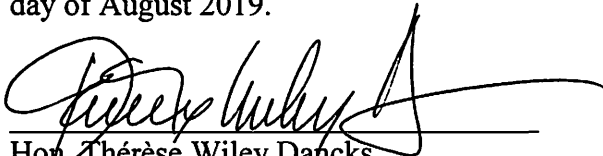
20. Based upon the above information, there is probable cause to believe that JEFFREY BLAKE used a facility and means of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce an individual who has not attained the age of 18 years to

engage in sexual activity for which any person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422(b). Your affiant respectfully requests that a criminal complaint be issued pursuant to these violations of federal law.



Jenelle Corrine Bringuel
Special Agent
Federal Bureau of Investigation

Sworn to me this 24th
day of August 2019.



Hon. Thérèse Wiley Dancks
United States Magistrate Judge